



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

ALAN H. SCHEINER
Senior Counsel
Phone: (212) 356-2344
Fax: (212) 356-3509
Email: ascheine@law.nyc.gov

January 5, 2023

BY ECF

Honorable Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Justin E. Baerga, et al. v. City of New York, et al.*, 21 Civ. 5762 (PAC)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for defendants the City of New York, Bill de Blasio, Dermot Shea, P.O. Krzysztof Wnorowski, P.O. Robert Sheron, Sgt. Nathan Mole, P.O. Martin Haber, P.O. Carrku Gbain, P.O. Andre Dawkins, P.O. Tyrone Fisher, P.O. Devindra Ramayya, P.O. Julian Torres, and P.O. Vikram Prasad. No conference is presently scheduled in this case.

Defendants write to respectfully request, with the consent of plaintiffs, a two-day adjournment of the briefing schedule on plaintiffs' pending motion for expedited discovery (ECF No. 121), extending the time for defendants to respond to the motion from January 9, 2023, to January 11, 2023, and extending the time for plaintiffs to reply to that motion from January 16, 2023, to January 18, 2023. The extension is requested because defendants to require an additional two days to complete their response to the motion due to emergent matters arising in other cases this week. (Defendants' counsel were out of the office on previously planned winter holiday vacations from December 25, 2022 through January 2, 2023.)

This is the first request for adjournment of these deadlines.

We thank the Court for its consideration of this matter.

Respectfully submitted,

Alan H. Scheiner /s/

Alan H. Scheiner

Senior Counsel

cc: All Counsel (via ECF)